

Workgroup Name and #: General/Registration Permits - Workgroup 11

1. Charge:

This workgroup will develop comprehensive programs for general and registration permits based on recommendations from the Stationary Source Strategy workgroup (workgroup #3). The general and registration permits will be designed to support the "one primary compliance document" concept. This workgroup will develop, at a minimum, 7 general permits types. The workgroup will also develop, at a minimum, one type of registration permit for construction of sources and one type of registration permit for operation of sources. This workgroup should start in May, 2004, and complete its work by December 2005. IT tools will be developed as funding is available for the Technology & Process workgroup (workgroup #6).

Products:

- Information on other States' general and registration permit programs for use by the Stationary Source Strategy workgroup (workgroup #3)
- Development of a consistent process for the processing and issuing of general and registration permits
- General and registration permit rules, including revisions to existing rules affected by general and registration permit rules
- Permit application forms and instructions
- Permit templates and cover letter templates
- General and registration permit outreach documents (e.g., fact sheets, letters) and web pages
- Economic analysis of the use of general and registration permits
- Recommendations related to compliance aspects of general and construction permits (e.g., inspection frequency, compliance certifications) based on the best practices of other States
- Recommendations for future general permits to develop
- IT tools to facilitate the application, processing and issuance of general and registration permits (work with workgroup #6 to develop these tools)

2. Targets that Apply to this Workgroup:

This workgroup will help the Air Permit Program achieve the following Air Permit Improvement Initiative (APII) targets:

- Process Target #2: By December 2005, develop, document, communicate, and manage an updated, consistent, and accurate process for issuing, renewing, and revising permits. Incorporate procedures for any new regulatory approaches into the process.
- Process Target # 4: Make 100% of permit decisions according to deadlines specified in 2003 WI Act 118.
- Environment Target #1: The Air Program sets data driven environmental goals and outcomes. By June 2005, demonstrate how the primary compliance document aids in meeting these goals and outcomes by fostering compliance, promoting improved environmental performance and rewarding businesses that go beyond compliance.
- Financial Target # 1: By June 2006, reduce the hours spent per permit review, renewal, and revision by an average of 20-40% while providing equal or better environmental protection.
- Financial Target #2: By June 2006, reduce by 40-50% the need to revise or modify permits. This could be accomplished by: sharing draft permits, incorporating flexibility; utilizing, modifying, or expanding exemptions; offering alternatives; or refining existing regulations. Evaluate the results of these strategies to ensure that they are consistent with our environmental and public input goals.
- Innovation/Learning Target #2: By June 2006, the Air Program will have available at least two or more regulatory alternatives to traditional permitting for qualifying sources. Such alternatives will provide equal or better environmental protection and opportunity for public input.
- Innovation/Learning Target #3: Whenever a new permit regulation or regulatory strategy is developed or updated, the Air Program actively works with partners to ensure there is effective communication, opportunity for input, and an appropriate level of education.

3. Expected improvements resulting from workgroup products

Improvements	Satisfies
Streamline permitting	LAB, Act 118, APII, Grow WI
Create alternative regulatory approaches	LAB, Act 118, APII, Grow WI
Increase permit timeliness	LAB, Act 118, Grow WI
Improved state-wide consistency	LAB, APII
Support sustainable program activities	NOD, APII
Facilitate combined construction/operation interface	NOD, APII, Grow WI

4. People/Expertise/Skills to be On the Workgroup and Resources Needed:

Resource	FY04-4	FY05-1	FY05-2	FY05-3	FY05-4	FY06-1	FY06-2	Total
Project Lead	100	100	100	100	100	100	100	700
Permit Section Chief	60	60	30	25	75	25	25	300
Compliance Section Chief	10	20	20	10	50	50	50	210
Operation Permit Team Leader	50	50	50	100	100	50	50	450
Construction Permit Team Leader	50	50	50	100	100	50	50	450
Modeling Team Leader	0	80	0	0	0	0	0	80
Operation Permit Engineer	0	0	100	100	100	0	0	300
Compliance Inspector	0	0	20	20	20	40	40	140
Legal	30	30	30	30	30	0	0	150
Administrative Support	20	20	20	20	20	20	20	140
Commerce	0	20	0	0	40	40	40	140
Industrial Reps (2)	0	40	0	40	40	40	40	200
Environmental Group Rep	0	20	0	20	20	20	20	100

5. Other people or projects this workgroup should coordinate with:

- This workgroup should coordinate its work with the following workgroups: Stationary Source Strategy (workgroup #3), Individually Negotiated Permits (workgroup #4), Management (workgroup #5), and Technology & Process (workgroup #6)
- BEITA forms specialist.

6. Dependencies – (what products does this workgroup rely on from others and what does this workgroup owe to others):

- This workgroup should provide information on general and registration permit programs in other States to the Stationary Source Strategy workgroup (workgroup #3)
- This workgroup should base its work on the recommendations provided by the Stationary Source Strategy workgroup (workgroup # 3).
- This workgroup must work with the Technology & Process workgroup (workgroup #6) to develop IT tools to support general and registration permits.
- This workgroup will be affected by the recommendations and findings of the following workgroups:
 - Traditional Permits (workgroup #4), especially the consolidated NSR/OP permit recommendations; and
 - Management (workgroup # 5)
 - Fees Workgroup